

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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MAS Wholesale Holdings LLC,

Plaintiff,

v.

NW Rosedale Inc., NW Coop City Inc., A&A  
Wholesale Holdings LLC, Mohammad Ashraf,  
and Ajay Sarin,

Defendants

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Civil Action No.: 1:19-cv-1294-PKC-  
VMS

**MOTION TO EXTEND TIME FOR  
SHOW CAUSE DEADLINE**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

This Motion to Extend Time for Show Cause Deadline is brought by the undersigned attorney Sergei Orel, Movant. Movant requests the Court to extend the March 26, 2021 show cause deadline by 30 days to April 25, 2021, in order to allow the undersigned attorney Sergei Orel to order and receive a Certificate of Good Standing from the State of New Jersey and to prepare and submit a *Pro Hac Vice* admission motion with this Honorable Court. The undersigned apologizes to this Honorable Court for an inadvertent omission to submit a motion for admission *Pro Hac Vice* with this Honorable Court. The undersigned unfortunately inadvertently missed the fact that the undersigned had failed accidentally to apply for *Pro Hac Vice* admission with this Honorable Court in this particular matter. The undersigned is admitted to the practice of law in the State of New Jersey and before the US District Court for the District of New Jersey. The undersigned has always applied for *Pro Hac Vice* admission with every US District Court outside of the District of New Jersey in the cases in which he was or is involved, admittedly, with the exception of this particular case, unfortunately and accidentally. I have

genuinely believed that I had applied for *Pro Hac Vice* admission in this matter. I have failed inadvertently to do that. For that I apologize profusely to this Honorable Court. I respectfully request the opportunity to apply for Pro Hac Vice admission to this Honorable Court at this time. In order for me to do that, I need to obtain a recent Good Standing Certificate from the State of New Jersey. It usually takes about one week to obtain one from the State of New Jersey. Hence my request for an extension by 30 days in this case. I should be grateful if this Honorable Court grant my request for 30 day extension in this matter. I would also like to apologize to this Honorable Court also for a somewhat overzealous representation of my clients at the last court hearing. I am known to be a very active, zealous and vocal advocate for my clients, and sometimes I may come across as abrasive and overzealous. I apologize profusely to this Honorable Court for having been too overzealous in my representation of my clients at the last hearing. It will never happen again, I promise you.

Dated: March 25, 2021

Respectfully submitted,

/s/ Sergei Orel

Sergei Orel

Attorney for Defendant  
Bar Number: 008862001  
Feigin & Fridman

1037 Route 46 East, Suite 107  
Clifton, New Jersey 07013  
Tel: 973-685-5280  
Fax: 973-767-1292  
sergei@patentlawny.com

### **CERTIFICATE OF SERVICE**

I, Sergei Orel, hereby certify that I caused a copy of this Motion to Extend Time for Show Cause Deadline to be electronically filed as follows: <https://ecf.nyed.uscourts.gov/cgi-bin/login.pl>

An email containing a link to a PDF version of the foregoing will be served electronically through the electronic filing system to all counsel of record at an email address(es) on file with the Court.

Dated: March 25, 2021

/s/ Sergei Orel

Sergei Orel